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Susan Halevy, Debtors and Debtors in Possession

8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re

12 SEATON INVESTMENTS, LLC, et al.,,

13 Debtors and Debtors In Possession.

15 ☐ Affects All Debtors.

16 ☐ Affects Seaton Investments, LLC

17 ☐ Affects Colyton Investments, LLC

18 ☒ Affects Broadway Avenue Investments, LLC

19 ☒ Affects SLA Investments, LLC

20 ☒ Affects Negev Investments, LLC

21 ☒ Affects Alan Gomperts

22 ☒ Affects Daniel Halevy

23 ☒ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;

2:24-bk-12082-VZ; 2:24-bk-12091-VZ;

2:24-bk-12074-VZ; 2:24-bk-12075-VZ and

2:24-bk-12076-VZ

Chapter 11

**SUPPLEMENTAL DECLARATION OF
ZEV SHECHTMAN IN SUPPORT OF
DEBTOR'S REPLY TO OPPOSITION
AND OBJECTION TO JOINT DEBTORS
MOTION TO APPROVE ADEQUACY OF
DISCLOSURE STATEMENT**

Date: February 27, 2025

Time: 11:00 a.m.

Crtrm.: 1368

255 E. Temple Street
Los Angeles, CA 90012

DECLARATION OF ZEV SHECHTMAN

I, Zev Shechtman, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts in the State of California. I am a partner with Saul Ewing LLP (“SE”), counsel of record for Alan Gomperts, Daniel Halevy, and Susan Halevy (the “Individual Debtors”). I have personal knowledge of the facts set forth in this Supplemental Declaration and, if called as a witness, could and would competently testify to such facts under oath.

2. On February 21, 2025, I filed a Declaration in support of the Debtors’ Reply to Opposition and Objection to Joint Debtors Motion to Approve Adequacy of Disclosure Statement (doc no. 440) which, among other things, described the discovery efforts to date.

3. I submit this supplemental declaration in support of the Debtors’ reply in support of their motion to approve the disclosure statement to update the Court on the status of discovery as of today.

4. The following chart documents the status of all discovery coordinated by SE as of February 24, 2025.

Party	Production/Bates No.	Notes re Redactions / Privilege
Christopher Maling	MALING 000001-24 (2/12) & privilege log (2/19)	Emails subject to Attorney Client Privilege; Attorney Work Production; Joint Interest Privilege
Almighty Builders, Inc. – Daniel Halevy	- ALMIGHTY 000001-22 (2/12) & privilege log (2/19) - ALMIGHTY 000023-41 (2/20)	redacted SSNs
Broadway Avenue Investments, LLC	- BROADWAY 000001-97 (2/12) & privilege log (2/19) - BROADWAY 000098-371 (2/20)	redacted bank account number

Jack Stephens	STEPHENS 00001-75 (2/12)	
Noah Emanuel Streit (an agent, Streit Capital Corp.)	<i>No production expected / loan offer withdrawn</i>	
Aric Streit (an agent, Vicino LLC)	<i>No production expected / loan offer withdrawn</i>	
Simon Financial, Inc.	<i>Awaiting / expected to produce (2/25/25)</i>	
View Behavioral Health, LLC – Conrad Nilo	VBH 000001-000871 (2/21)	Redacted SSNs
View Behavioral Health-Colton LLC – Conrad Nilo	VBH COLTON 000001-000758(2/21)	
View Behavioral Health-Colton II LLC – Conrad Nilo	VBH COLTON II 000001-000742 (2/21)	
The DMB Fund (Steve Gold)	DMB 000001-50 (2/18)	

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 24th day of February, 2025, at Los Angeles, California.


Zev Shechtman

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Supplemental Declaration of Zev Shechtman in Support of Debtor's Reply to Opposition and Objection to Joint Debtors Motion to Approve Adequacy of Disclosure Statement** be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **February 24, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 24, 2025
Date

Hannah Richmond
Printed Name

/s/ Hannah Richmond
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- **Tanya Behnam** tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocting@polsinelli.com
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- **David B Shemano** dshemano@shemanolaw.com
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- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
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- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com